



RYDER ♦ LU ♦ MAZZEO ♦ KONIECZNY LLC

INTELLECTUAL PROPERTY LAW

March 27, 2018

Honorable Judge A. Kathleen Tomlinson
U.S. District Magistrate Judge
U.S. District Court, Eastern District of New York
100 Federal Plaza, P.O. Box 9014
Central Islip, NY 11722-9014

**VIA ECF AND COURTESY
COPY VIA FACSIMILE TO
(631) 712-5766**

Re: Motion for Extension of Time to File Answer or Otherwise Respond to Complaint
Global Commodities, Inc. v. Ali Baba Enterprises of NY, Inc. *et al.*
U.S. District Court, Eastern District of New York
Case No.: 2:18-cv-00498

Dear Judge Tomlinson:

Pursuant to Local Civil Rule 37.3, we submit this letter motion on behalf of the defendants Ali Baba Enterprises of NY, Inc. and Sayed Hassib Azam ("Defendants"), in the above-captioned matter. We hereby respectfully request a thirty (30) day extension of time for Defendants to file an answer or otherwise respond to the Complaint filed on January 24, 2018, until and including April 26, 2018.

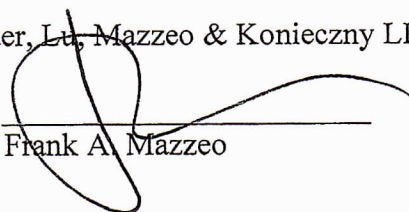
Defendants were served with the Complaint on February 14, 2018, and Defendants' Answer was originally due by March 7, 2018. However, we were retained by Defendants to represent them in this matter only today, March 27, 2018. We contacted representative counsel for Global Commodities, Inc. today requesting the plaintiff's consent to this extension of time, but Global Commodities, Inc. refused its consent. The plaintiff's counsel informed us that an extension of time to file an Answer or otherwise respond to the Complaint had been given to Defendants' prior counsel in this matter, but no stipulation for the extension was filed with the Court. Accordingly, this is Defendants' first formal request for an extension.

As we have only just been retained by Defendants, the extension would allow us sufficient time to investigate the facts and claims raised in the Complaint to competently represent Defendants in this matter. Additionally, the extension would permit the parties to discuss terms for settlement. A proposed order is enclosed.

Thank you in advance for your attention to this matter.

Very truly yours,

Ryder, Lu, Mazzeo & Konieczny LLC

By: 
Frank A. Mazzeo

FAM/DY
cc: Todd Wengrovsky, Esq. (via ECF and email)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
GLOBAL COMMODITIES, INC.,

Plaintiff,

-against-

Case No. 2:18-cv-00498

ALI BABA ENTERPRISES OF NY, INC. AND
SAYED HASSIB AZAM,

Defendants.
-----X

PROPOSED ORDER

The Court, having considered Defendants' Motion for Extension of Time to File Answer or Otherwise Respond to Complaint and good cause having been shown,

IT IS HEREBY ORDERED this _____ day of _____, 2018 that Defendants' Motion is GRANTED until and including April 26, 2018.

United States District Judge